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St. Joseph Transitional Rehabilitation
Center, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ELIZABETH KENNEDY, MERCY
VISMANOS, and ARIANA SANCHEZ,

Plaintiffs,

vs.

ST. JOSEPH TRANSITIONAL
REHABILITATION CENTER, LLC, DOES
1-50, inclusive and ROE CORPORATIONS 1-
50, inclusive,

Defendants.

Case No. 2:20-cv-02017-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO FILE A RESPONSE
TO PLAINTIFFS' COMPLAINT**

(Second Request)

Defendant St. Joseph Transitional Rehabilitation Center, LLC ("Defendant") by and through its counsel, Jackson Lewis P.C., and Plaintiffs Elizabeth Kennedy, Mercy Vismanos and Ariana Sanchez ("Plaintiffs") by and through their counsel, HKM Employment Attorneys LLP, hereby stipulate and agree to a second extension of the time for Defendant to file a response to Plaintiffs' Complaint. Defendant was served on November 3, 2020. Defendant's responsive pleading was previously extended to December 15, 2020.

Plaintiffs and Defendant have agreed to a one-week extension of time for Defendant to file a response to the Complaint for the following reasons. Undersigned Defense Counsel, Deverie Christensen, is the managing partner of the Las Vegas office of Jackson Lewis PC. Yesterday, on December 9, 2020, Ms. Christensen was informed that one of the employees in her office received a positive test result for Covid19, and the entire office was exposed to Covid19 over the

1 past several days. Although the office has taken safety precautions recommended by the Centers
 2 for Disease Control (CDC), including wearing masks, social distancing, and sanitizing, given the
 3 prolonged exposure during work hours and symptoms that employees have begun to report
 4 experiencing, Ms. Christensen is shutting down the office for the next 10-14 days, arranging
 5 testing for the employees, undertaking deep cleaning and sanitizing, and requiring any employees
 6 who also test positive or experience symptoms to quarantine for 14 days. In light of these
 7 necessary and extensive measures, Ms. Christensen and her colleagues are experiencing an
 8 emergency that affects the ability of the attorneys and staff to meet pending deadlines, and they
 9 have requested extensions on pressing deadlines in the short-term to, first and foremost, ensure
 10 the safety of the employees and anyone else with whom they have been in prolonged contact
 11 since exposure. Accordingly, Ms. Christensen requested a one-week extension for Defendant to
 12 file a response to Plaintiffs' Complaint, and Plaintiffs' counsel graciously agreed to the extension.

13 Defendant shall, therefore, have a one (1) week extension from the current deadline to file
 14 a responsive pleading to Plaintiffs' Complaint, and Defendant's responsive pleading shall be due
 15 on December 22, 2020.

16 This stipulation and order is sought in good faith and not for the purpose of delay. One
 17 prior request for an extension of time has been made.

18 Dated this 10th day of December, 2020.

19 HKM EMPLOYMENT ATTORNEYS LLP JACKSON LEWIS P.C.

20 /s/ Dana Sniegocki
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27 /s/ Deverie J. Christensen
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*Attorneys for Defendant St. Joseph Transitional
 Rehabilitation Center, LLC*

ORDER

IT IS SO ORDERED:

Dated: December 11, 2020


 U.S. DISTRICT COURT/MAGISTRATE JUDGE